

# **EXHIBIT 11**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

AIMEE MADDONNA,  
Plaintiff,  
vs. CIVIL ACTION NO. 6:19-cv-03551-JD  
UNITED STATES DEPARTMENT OF HEALTH AND  
HUMAN SERVICES, ET AL.,  
Defendants.

VIDEO TELECONFERENCE

DEPOSITION OF: AIMEE MADDONNA  
DATE: February 14, 2022  
TIME: 9:12 A.M.

LOCATION: Residence of Aimee Maddonna

TAKEN BY: Counsel for the Defendants Governor  
Henry McMaster and Director Michael  
Leach

REPORTED BY: LORI S. MORTGE,  
Certified Court  
Reporter, CCR

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21  
22  
23  
24  
25 (INDEX AT REAR OF TRANSCRIPT)

1           A.     So we're total -- okay. Okay, cool. So  
2 we're totally off that one so it's not related;  
3 right?

4           Q.     It's the same -- everything is related.

5           A.     I know everything is related. It's  
6 different than -- okay. Different line of  
7 questions. Okay.

8           Q.     Yes. So I guess what I'm asking is, you  
9 know, one of the things in the Complaint is that  
10 your understanding, what you've heard, is that  
11 Miracle Hill has the most and the best resources and  
12 support it can offer to foster parents. I believe  
13 you, I believe that's what you've heard, I don't  
14 disagree with that.

15                     My question is if -- if it were to turn  
16 out -- if we were to find out that other CPAs in  
17 Greenville had the same types and -- and comparable  
18 kinds of resources and support to offer, then the  
19 ability -- the availability of support and resources  
20 between Miracle Hill or the others, if they're the  
21 same or comparable, then that's not any -- any basis  
22 upon which one is better than the other if they can  
23 offer the same or comparable things; right?

24           A.     My answer to that is two-fold. The  
25 first one being that the reason why there would be

1 more than one agency is presumably because different  
2 families have different needs, different children  
3 have different needs. So what might be fabulous  
4 resources in one may still not suit the needs of  
5 somebody else.

6 Miracle Hill offered resources that at  
7 the time their specific programs were not, to the  
8 best of my knowledge, offered anywhere else. That's  
9 not to say that other CSAs may not have had great  
10 resources, just that it's my understanding that  
11 different CSAs exist to meet the needs of different  
12 types of people.

13 Similarly -- or not similarly but also  
14 to answer the question, the resources being offered  
15 don't take away from that. It's -- if in order to  
16 garner those resources you have to pass a religious  
17 litmus test, that doesn't open any doors in my  
18 opinion. That's -- so I don't...

19 Q. Sure. And I'm not saying that the  
20 availability of support and resources is the only  
21 issue. Obviously -- we spent hours already this  
22 morning talking about the fact there's this other  
23 piece of the religious selectivity. I'm not saying  
24 that doesn't exist. I'm just trying to say --  
25 figure out what the other categories of difference

1 or harm are.

2 Do you know whether other CPAs offer  
3 similar types of support and resources to Miracle  
4 Hill, or are you just --

5 A. Well, no, no, but that's also why I said  
6 that for me this is -- this is -- Miracle Hill is  
7 the name in everybody's mouth. It's great that  
8 other CSAs are coming open or becoming more  
9 surfaced; okay? But I can -- I can still say that  
10 in my community the only one that anybody is aware  
11 of is Miracle Hill. Those are the resources that  
12 are talked about. That's the option that is  
13 discussed. That's the -- that's still the one  
14 that's the most known.

15 So I don't know what -- I can't speak to  
16 what resources are -- and I can't even speak to  
17 what's comparable because the whole point of having  
18 more than one CSA in an area would be, I presume,  
19 because my idea of best resources, even comparable  
20 resources, is going to depend on the needs of me and  
21 my family and the children that that CSA serves.

22 I can't speak to -- I can't even, not in  
23 good conscious, speak as far as comparable services  
24 and everything else because there are different  
25 types of CSAs that offer different things. I don't

1 know about here specifically but I do know that, in  
2 general, different CSAs offer different things.  
3 Like you said, regular foster placement, some of  
4 them offer therapeutic foster placement. Some of  
5 them offer, you know, some sort of transitional or  
6 group housing. I'm sure they offer different levels  
7 of foster parent support and all of that because  
8 that's how CSAs work.

9 But I don't know specifically for here  
10 because Miracle Hill is just the one that's talked  
11 about. It's the only one that's -- it's the only  
12 one that I -- it's still the only one I know of by  
13 name. I know that there are others, but in my  
14 group -- but in my community that's the one that I  
15 know of. And I can't speak for comparable or better  
16 or most because that's going to vary depend on --  
17 depending on what the need is.

18 Q. So let me ask a couple of follow-ups  
19 there, and one is just a very minor technical point  
20 but just for the sake of the record, I'm not trying  
21 to be nitpicky.

22 A. Mm-hmm.

23 Q. You keep saying CSA and I keep saying  
24 CPA. We're talking about --

25 A. You're completely right. I don't know

1 why -- CPA I guess...

2 Q. It's not like an accountant; right?

3 A. Right. It does -- if you say CPA,  
4 that's where my ADHD brain is going. I'm, like, CPA  
5 just doesn't sound right so it must be CSA.

6 Q. Listen. You keep calling it CSA if you  
7 want. I just want -- later when we look at this  
8 transcript we understand that every time you say CSA  
9 we're talking about a CPA, but that's fine. You  
10 call it that.

11 A. Yeah. So CSA to me, I guess in my head  
12 I'm thinking child services agency. And like I  
13 heard some people call I think in some areas CPS,  
14 child protective services, is, like the equivalent  
15 to where I grew up was DSS, Department of Social  
16 Services. So I guess I'm thinking because CPA  
17 sounds like an accountant so I don't --

18 Q. That's fine. I just wanted to make sure  
19 that you're talking about the other name --

20 A. You're absolutely right.

21 Q. So let me ask, too, related to an answer  
22 you gave a moment ago.

23 A. Mm-hmm.

24 Q. I'm not asking you to name other CPAs in  
25 the Upstate. I'm not asking you to tell me who has